

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

MANJUNATH A. GOKARE, P.C., and	:	
GOLDSTEIN DEMCHAK BALLER	:	
BORGEN & DARDARIAN, P.C.,	:	
on behalf of themselves and a class of	:	
all persons similarly situated,	:	
Plaintiffs,	:	Civil Action
v.	:	No. 2:11-CV-2131-JTF-CGC
FEDERAL EXPRESS	:	Class Action
CORPORATION and FEDEX	:	
CORPORATE SERVICES INC.,	:	Jury Trial Demanded
Defendants.	:	

JOINT MOTION FOR 45-DAY STAY

Plaintiffs and Defendants have recently conferred and believe that now is an opportune and appropriate time to participate in a mediation to see whether this matter can be fairly resolved. In order to provide the greatest likelihood of a successful mediation, the parties request that this Court stay this case for forty-five (45) days. The parties believe a stay is necessary to (1) maintain the status quo during the mediation to avoid any actual or perceived shifts in negotiating power and (2) permit the parties to focus on preparing for and participating in the mediation (particularly given the upcoming expert and class certification deadlines).

Therefore, the parties respectfully request that the Court stay this matter in all respects (including reserving rulings on all pending motions) for forty-five (45) calendar days. In the event that the mediation is unsuccessful and the stay expires, the deadlines set forth in the Court's recently-entered Scheduling Order (Dkt. No. 232) will simply be pushed back 45 calendar days.

A proposed Order is attached as Exhibit A for the Court's convenience.

Respectfully submitted this 17th day of April 2013,

ON BEHALF OF PLAINTIFFS:

/s/ Steven J. Rosenwasser

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